UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PATRICIA ESPEJO, Plaintiff, v. BIOMED REALTY TRUST, INC. and LOUGHLIN PERSONNEL, LTD, Defendants.	**ECF CASE** **Case 07-Civ-1035 (CLB)(GAY)** **PLIANTIFF'S RULE 26 INITIAL DISCLOSURE**

The plaintiff, through the undersigned counsel, submits this disclosure statement pursuant to Federal Rules of Civil Procedure 26 (a) (1). Plaintiff reserves her right to amend and supplement this disclosure as discovery and plaintiff's investigation progresses.

I. POTENTIAL WITNESSES

	NAME	CONTACT INFORMATION (If known)	SUBJECT OF INFORMATION
1.	Leigh Ann Wilsen	Loughlin Personnel Agency	She is likely to have discoverable information regarding the unlawful termination of Plaintiff's employment and other offensive and discriminatory practices directed towards Plaintiff.
2.	Jim Brierley	BioMed Realty Trust	He is likely to have discoverable information regarding the unlawful termination of Plaintiff's employment and other offensive and discriminatory practices directed towards Plaintiff.
3.	Susan Duke	BioMed Realty Trust	She is likely to have discoverable information regarding the unlawful termination of Plaintiff's employment and other offensive

			and discriminatory practices directed towards Plaintiff.
4.	Laura Loughlin	Loughlin Personnel Agency	She is likely to have discoverable information regarding the unlawful termination of Plaintiff's employment and other offensive and discriminatory practices directed towards Plaintiff.
5.	William Gartner	Bio Med Realty	He is likely to have discoverable information regarding the unlawful termination of Plaintiff's employment and other offensive and discriminatory practices directed towards Plaintiff.
6.	Karen Straizhcer	Bio Med Realty	He is likely to have discoverable information regarding the unlawful termination of Plaintiff's employment and other offensive and discriminatory practices directed towards Plaintiff.

II. DOCUMENTS

Most of the documents and information relevant to Plaintiff's claim are in the possession, custody and control of individuals and entities other than Plaintiff, including but not limited to, the defendants.

Plaintiff will make available those non-privileged, relevant documents that are in her possession, custody or control that tends to support Plaintiff's position in this case. In particular, the plaintiff will make available the following general categories of documents:

	Document:	Location:
1.	Plaintiff's correspondence with defendant relating to changing his working conditions and/or schedule and to refute the defendant's claim of unsatisfactory job performance.	Defendants.

2. Documents from the EEOC's investigative file. Presently with the EEOC

III. DAMAGES

Plaintiff's seeks all actual, statutory, direct, consequential, and incidental damages, the precise amounts of which are subject to proof at trial. Plaintiff is also entitled to back-pay, front-pay, monetary loss of employment health benefits, exemplary and civil penalties as applicable for the causes of action, pre and post-judgment interest, reasonable attorney's fees, expert witness fees and other costs, and any other further relief as the Court deems just and proper. Plaintiffs reserve the right to supplement the types of damages sought prior to trial based on discovery.

Damages may be the subject of expert testimony. Plaintiff has not yet retained an expert on damages and is therefore not in possession of such expert's damage analysis.

Dated: New York, New York
March 5, 2008

Respectfully submitted,

By: ______________________

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